

1 LAW OFFICE OF IRENE KARBELASHVILI  
 Irene Karbelashvili, State Bar Number 232223  
 2 Irakli Karbelashvili, State Bar Number 302971  
 12 South First Street, Suite 413  
 3 San Jose, CA 95113  
 Telephone: (408) 295-0137  
 4 Fax: (408) 295-0142

VENARDI ZURADA LLP  
 Mark Lain Venardi, State Bar Number 173140  
 Mark Thomas Freeman, State Bar Number  
 293721  
 700 Ygnacio Valley Road Suite 300  
 Walnut Creek, CA 94596  
 Ph: 925-937-3900  
 Fax: 925-937-3905

5  
 6 Attorneys for SHELBY GAIL HEIFETZ, Plaintiff

Attorneys for Defendants ZIO FRAEDOS, INC., a  
 California corporation, d/b/a ZIO FRAEDO’S; and  
 ANTHONY F. LOFORTE, SR., in his individual  
 and representative capacity as Trustee of the  
 ANTHONY F. LOFORTE SR. LIVING TRUST

7  
 8  
 9  
 10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12  
 13 SHELBY GAIL HEIFETZ,  
 14 Plaintiff,

15 vs.

16 ZIO FRAEDOS, INC., a California  
 corporation, d/b/a ZIO FRAEDO’S;  
 17 ANTHONY F. LOFORTE, SR., in his  
 18 individual and representative capacity as  
 Trustee of the ANTHONY F. LOFORTE SR.  
 19 LIVING TRUST; and DOES 1-10, inclusive,

20 Defendants

Case No. 16-cv-5535-WHA

**STIPULATION AND ~~PROPOSED~~  
 ORDER CONTINUING GENERAL  
 ORDER 56 JOINT INSPECTION  
 DEADLINE**

21  
 22 **STIPULATION**

23 Plaintiff Shelby Gail Heifetz (“Plaintiff”) and Defendants Zio Fraedos, Inc. and Anthony  
 24 F. Loforte, Sr. (“Defendants”) stipulate to continue the joint inspection deadline until February  
 25 15, 2017. The parties do so based on the following:

- 26 1. Plaintiff filed her complaint on September 29, 2016.
- 27 2. On November 3, 2016 Plaintiff served the summons, complaint, and related documents  
 on Defendants.
- 28 3. Defendants did not retain counsel until December of 2016 and Plaintiff’s counsel was

1 first contacted by defense counsel on December 15, 2016. Plaintiff agreed to stipulate to extend  
2 Defendant's response to Plaintiff's complaint by 30 days. The Court granted the stipulation (Dkt.  
3 12). Defendants filed their answer on January 6, 2017.

4 4. The parties believe that a formal inspection in accordance with the provisions of General  
5 Order 56 will be helpful in resolving the issue of injunctive relief. Unfortunately, due to the  
6 delay in Defendants retaining counsel and everyone's conflicting schedules, the earliest available  
7 date for everyone to conduct the inspection is February 15, 2017.

8 **IT IS SO STIPULATED.**

9  
10 Dated: February 12, 2017

10 /s/ Irene Karbelashvili  
11 Irene Karbelashvili, Attorney for  
12 Plaintiff SHELBY GAIL HEIFETZ

13 Dated: February 13, 2017

13 /s/ Mark Lain Venardi  
14 Mark Lain Venardi, Attorney for  
15 Defendants Zio Fraedo's, Inc. and Anthony F.  
16 Loforte, Sr.

17 **FILER'S ATTESTATION**

18 Pursuant to Local Rule 5-1, I hereby attest that on, I, Irene Karbelashvili, received the  
19 concurrence of counsel for Defendants in the filing of this document.

20  
21 By: /s/ Irene Karbelashvili  
22 IRENE KARBELASHVILI

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**FOR GOOD CAUSE SHOWN, IT IS SO ORDERED:**

That the last date for the Parties' Joint Site Inspection under General Order 56 is hereby modified so that the time to conduct the Joint Site Inspection is hereby extended to no later than February 15, 2017. The last dates under General Order 56 for the Parties' Meet and Confer and Notice for Mediation shall be modified accordingly.

This order is conditioned on the requirement that the inspection in fact occur by February 15.

DATED: February 14, 2017.

  
United States District Judge